



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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July 10, 2024

Via ECF

Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Nunzio Calce et al., v. The City of New York
Civil Action No. 1:21-8208 (ER)

Dear Judge Ramos:

This Office represents Defendant, the City of New York, in the above-entitled action and submits this letter-motion pursuant to Rule 1E of Your Honor's Individual Practices in Civil Cases to request a 2-week extension of time, from July 12, 2024 to July 26, 2024, for Defendant to file its final reply in further support of its cross-motion for summary judgment and in opposition to Plaintiffs' motion for summary judgment. Over the past several days, I have reached out to Plaintiffs' counsel both by email and telephone to obtain his consent but have not received a response.

Defendant requests this 2-week extension due to unforeseen, work-related scheduling conflicts. This is Defendant's second request for an extension of time to submit its final reply in support of its cross-motion for summary judgment and in opposition to Plaintiff's motion for summary judgment. No other dates will be affected by this request.

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/ Samantha Schonfeld

cc: All Counsel of Record (via ECF)